

Respectfully submitted,

/s/ Harvey G. Joseph

HARVEY G. JOSEPH

State Bar No. 11027850

LAW OFFICES OF HARVEY G. JOSEPH

P.O. Box 810485

Dallas, Texas 75381-0485

(214) 769-6078 (telephone)

(214) 426-1246 (facsimile)

hjoseph197@aol.com

**ATTORNEY FOR BOB SHELTON, AS TRUSTEE OF
BARBARA JEAN BROWN LIVING TRUST DTD
5/29/2018**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this, the 21st day of July, 2021, the foregoing document was electronically submitted to the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the Court. The electronic case files system sent a "Notice of Electronic Filing" to the following individual who has consented in writing to accept this Notice as service of this document by electronic means:

Ms. Linda G. Moore

ESTES THORNE & CARR PLLC

3811 Turtle Creek Blvd. Suite 2000

Dallas, Texas 75219

Sharon Britton

Mrs.sharon.britton@gmail.com

Ken Britton

Mr.ken.britton@gmail.com

<input checked="" type="checkbox"/>	Via ECF
<input type="checkbox"/>	Via Certified Mail, RRE
<input type="checkbox"/>	Via Facsimile
<input type="checkbox"/>	Via Regular Mail
<input type="checkbox"/>	Via ECF
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<input type="checkbox"/>	Via Regular Mail

/s/ Harvey G. Joseph

HARVEY G. JOSEPH

2. I am familiar with the file in this action and the pleadings and other papers filed herein. This Declaration is submitted in support of Shelton's Request to recover his attorneys' fees and costs in this action.

3. I have been licensed since 1985 and am board certified in Civil Appellate Law by the Texas Board of Legal Specialization. I am licensed in this Court as well as the Fifth Circuit and United States. I keep and input my own timekeeping records in the course of a regularly conducted business activity, and it is the regular practice of this law firm to keep such business records. All such records are made at or near the time of the act or events described in them, by me.

4. I personally enter my time. I keep track of my time during the day as I perform tasks for each client matter on which I work that day. At the end of the month, an invoice is generated by me.

5. During the time I have been representing Shelton in this matter, all of my own timekeeping records were kept and maintained in accordance with the above-described process. I have personally reviewed all of the time records relating to Shelton's representation throughout this litigation.

6. Shelton has incurred legal fees in connection with being a defendant and protecting Shelton's rights in this litigation. I certify that the fees for the legal services the Law Offices of Harvey G. Joseph has provided to Shelton during the course of this lawsuit from April 6, 2021 through July 21, 2021 amount to \$9,020.00.

7. Attached hereto are true and correct copies of the firm's invoices reflecting the time incurred by me, and to assist the Court in determining appropriate or reasonable attorneys' fees in light of the legal services required. While a July invoice has not been generated yet, a total of 14.1

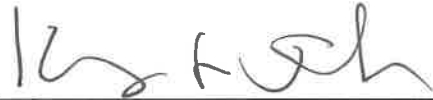
hours has been expended in a review of Plaintiff's pleadings and motions, research of the issues and case law needed to file a detailed response to Plaintiff's motions, as well as consultations with my client and drafting a Response to Plaintiff's motions and this Declaration.

8. The charges for my services are an hourly rate of \$350.00 an hour negotiated with this client. In certain instances in this matter, time actually incurred has been reduced by me as believed appropriate in relation to the amount in controversy and complexity of the particular service performed.

9. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

SIGNED: July 21, 2021.

Respectfully submitted,



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Harvey G. Joseph
THE LAW OFFICES OF HARVEY G. JOSEPH
P.O. Box 810485
Dallas, Texas 75381
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Fax: 214.426.1246

June 1, 2021

Via E-Mail and Facsimile

Bob J. Shelton P.C.
ATTN: Bob J. Shelton
5103 Chad Drive
Arlington, Texas 76017
bjslaw@swbell.net

Re: New York Life Matter

FOR SERVICES RENDERED

Date	Description	Hours
05/05/2021	Meeting with B. Shelton to discuss case and case strategy.	1.0
05/06/2021	Reviewed Interpleader Complaint; retrieved and reviewed all documents previously filed in this case; drafted Answer, including research in connection with a potential jurisdictional issue.	4.3
05/10/2021	Finalized and filed Answer.	.4
05/11/2021	Conversation with New York Life counsel concerning settlement; conversation with B.. Shelton concerning same.	.6
05/24/2021	Traveled to and from office of counsel for New York Life to conduct in person conference on Joint Report Regarding Contents of Scheduling Order as required by the trial court; drafted B. Shelton, as trustee, position concerning Contents of Scheduling Order.	2.8
05/25/2021	Conversations with counsel for New York Life concerning when and how to file Joint Notice Concerning Contents of Scheduling Order.	.3
TOTAL HOURS		9.40
Fees due and owing: 9.4 hours @ \$350.00/hour		\$ 3,290.00

June 1, 2021
Bob J. Shelton P.C.
Page 2

Date	Description	Hours
	TOTAL DUE AND OWING (Fees and Expenses)	<u>\$ 3,290.00</u>

Harvey G. Joseph
THE LAW OFFICES OF HARVEY G. JOSEPH
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Telephone: 214.769.6078
Fax: 214.426.1246

July 2, 2021

Via E-Mail and Facsimile

Bob J. Shelton P.C.
ATTN: Bob J. Shelton
5103 Chad Drive
Arlington, Texas 76017
bjslaw@swbell.net

Re: New York Life Matter

FOR SERVICES RENDERED

Date	Description	Hours
06/16/2021	Conversations with L. Moore concerning potential settlement. Conversation with B. Shelton concerning same.	.6
06/21/2021	Conversation with L. Moore concerning potential settlement.	.2
06/25/2021	Reviewed and analyzed New York Life's Initial Disclosure Responses.	.4
06/29/2021	Drafted and served B. Shelton's Initial Disclosure Responses.	1.1

TOTAL HOURS	2.3
Fees due and owing: 2.3 hours @ \$350.00/hour	\$ 805.00

Date	Description	Hours
	TOTAL DUE AND OWING (Fees and Expenses)	<u>\$ 805.00</u>

Taxpayer ID Number 452-39-0396